

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

THOMSON REUTERS ENTERPRISE)	
CENTRE GMBH and WEST PUBLISHING)	
CORPORATION,)	
)	
Plaintiffs and)	
Counterdefendants,)	
)	C.A. No. 20-613 (SB)
v.)	
)	
ROSS INTELLIGENCE INC.,)	
)	
Defendant and)	
Counterclaimant.)	

**PLAINTIFFS AND COUNTERDEFENDANTS’
NOTICE OF DEPOSITION TO SEAN SHAFIK**

PLEASE TAKE NOTICE that pursuant to Federal Rules of Civil Procedure 26 and 30, Plaintiffs and Counterdefendants Thomson Reuters Enterprise Centre GmbH (“Thomson Reuters”) and West Publishing Corporation (“West”) (collectively “Plaintiffs”) will take the deposition upon oral examination of Sean Shafik.

The deposition will begin on **April 28, 2023**, at the offices of Kirkland & Ellis LLP, 555 California Street, San Francisco, CA 94104, at 9:00 a.m. PT, and will be held before a notary public or other person authorized to administer oaths in this action. The deposition will continue from day to day until completed, with such adjournments as to time and place as may be necessary. The deposition may be recorded by stenographic, audio, audiovisual, video and/or real-time computer means. The deposition will be taken for purposes of discovery, use at trial or hearings, and for any other purpose permitted under the orders of the presiding Court, the Federal Rules of Civil Procedure, and the Federal Rules of Evidence.

PLEASE TAKE FURTHER NOTICE THAT Plaintiffs further reserve the right to conduct this deposition remotely using secure web-based deposition service or telephonically to provide remote access for those parties wishing to participate in the deposition via the internet and/or telephone. Also take notice that the court reporter may be appearing remotely for the purposes of reporting the proceeding and may or may not be in the presence of the deponent. Plaintiffs reserve the right to utilize electronic exhibit software during the deposition. Plaintiffs are prepared to work with deponent's attorneys regarding the logistics of the deposition to the extent required or advisable due to the ongoing novel coronavirus pandemic. Please contact the noticing attorney at least two (2) business days prior to the deposition to advise that it is your desire to appear via this remote participating means so that the necessary credentials, call-in numbers, testing and information, if necessary, can be provided to you prior to the proceedings.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Michael J. Flynn

OF COUNSEL:

Daniel E. Laytin
Christa C. Cottrell
Cameron Ginder
Alyssa C. Kalisky
KIRKLAND & ELLIS LLP
300 North LaSalle
Chicago, IL 60654
(312) 862-2000

March 17, 2023

Jack B. Blumenfeld (#1014)
Michael J. Flynn (#5333)
1201 North Market Street
P.O. Box 1347
Wilmington, DE 19899
(302) 658-9200
jblumenfeld@morrisnichols.com
mflynn@morrisnichols.com

*Attorneys for Plaintiffs and
Counterdefendants Thomson Reuters
Enterprise Center GmbH and West Publishing
Corporation*

CERTIFICATE OF SERVICE

I hereby certify that on March 17, 2023, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on March 17, 2023, upon the following in the manner indicated:

David E. Moore, Esquire
Bindu Palapura, Esquire
POTTER ANDERSON & CORROON LLP
Hercules Plaza, 6th Floor
1313 North Market Street
Wilmington, DE 19801
Attorneys for Defendant and Counterclaimant

VIA ELECTRONIC MAIL

Mark A. Klapow, Esquire
Lisa Kimmel, Esquire
Crinesha B. Berry, Esquire
CROWELL & MORING LLP
1001 Pennsylvania Avenue NW
Washington, DC 20004
Attorneys for Defendant and Counterclaimant

VIA ELECTRONIC MAIL

Gabriel M. Ramsey, Esquire
Jacob Canter, Esquire
Warrington Parker, Esquire
CROWELL & MORING LLP
3 Embarcadero Center, 26th Floor
San Francisco, CA 94111
Attorneys for Defendant and Counterclaimant

VIA ELECTRONIC MAIL

/s/ Michael J. Flynn

Michael J. Flynn (#5333)